

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

_____)	
ERIK SHEEHAN,)	
)	
Plaintiff,)	
)	CIVIL ACTION
v.)	NO. 04 CV 12364 JGD
)	
VERIZON COMMUNICATIONS, INC.)	
)	
Defendant.)	
_____)	

JOINT EMERGENCY MOTION TO CONTINUE HEARING

The parties hereby jointly move on an emergency basis to continue the hearing on the Plaintiff's Motion to Compel Further Discovery, scheduled for today, December 21, 2005 at 2:00 p.m., to the first week in January or to such other time as is convenient for the Court. In support of this Motion, the parties state the following:

1. Plaintiff's counsel, Domenic Finelli, recently had back surgery and is in the process of recovering from that procedure. Today, Attorney Finelli had an appointment with his physician for follow up care, and is experiencing pain from the surgery. Therefore, he is unable to appear for the hearing this afternoon.

2. Paul Tuttle, counsel to Domenic Finelli, has an appearance on the case, but is on vacation and is unable to appear in lieu of Attorney Finelli.

3. In light of the circumstances, the Defendant hereby joins the Plaintiff in requesting a brief continuance of the hearing, scheduled for this afternoon, with the parties' apologies to the Court for the short notice.

4. Both parties are available to appear for the hearing on January 3, 2006, if that date is convenient to the Court.

Respectfully submitted,

ERIK SHEEHAN
By his attorney,

VERIZON COMMUNICATIONS, INC.
By its attorneys,

/s/ Domenic Finelli
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Date: December 21, 2005

CERTIFICATE OF SERVICE

I, Windy L. Rosebush, hereby certify that on December 21, 2005, I caused a copy of the foregoing document to be served electronically on Paul Tuttle via facsimile to the office of Domenic Finelli, Esq., Barrister Hall, 199 Revere Street, Revere, MA 02151.

/s/ Windy L. Rosebush